

REMARKS

Claims 1-3 and 6-26 are pending in the current application. Claims 1, 6 and 25 are currently amended. Claims 4 and 5 are canceled.

Examiner Interview Request

Applicants respectfully request an interview with the Examiner to discuss this application. Please contact John Ambrose at 703-668—8026 to schedule the interview.

Foreign Priority

Applicants respectfully submit, the Examiner has not indicated whether the claim of foreign priority under 35 U.S.C. § 119 has been acknowledged. Applicants respectfully request the Examiner's cooperation with this matter in the Examiner's cooperation in the next Patent Office communication.

Formal Drawings

Further, the Examiner has not indicated whether the drawings filed February 19, 2004 are accepted or objected to by the Examiner. Applicants respectfully request the Examiner's cooperation with this matter in the Examiner's cooperation in the next Patent Office communication.

Claim Rejections – 35 U.S.C. § 112

Claims 1-3 and 6-25 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite. The Examiner asserts the term “graphic information” lacks antecedent basis and should be amended to read “graphic link information”.

Applicants respectfully submit the claims have been amended in accordance with the Examiner's suggestion. Accordingly, claims 1-3 and 6-25 are not indefinite and meet the requirements of 35 U.S.C. § 112, second paragraph.

Therefore, Applicants respectfully request the rejection of claims 1-3 and 6-25 under 35 U.S.C. § 103 be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claim 25 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tahara et al. (US 5,909,551, hereinafter "Tahara") and further in view of Kim (US 5,754,435, hereinafter "Kim").

Claim 25 recites "reading graphic link information stored in a first file on the recording medium, the graphic link information including a plurality of pieces of graphic link information, each of the plurality of pieces of graphic link information linking a corresponding graphic image stored in a second file separate from the first file with a plurality of main video image". Applicants respectfully submit neither Tahara, nor Kim, alone or in combination, teach these limitations.

With respect to the "graphic link information" and "graphic image" recited in claim 25, the Examiner appears to have two conflicting interpretations of the teachings of Tahara. With respect to the first interpretation, on page 3 of the current Office Action, the Examiner appears to reference the PCLINK.TBI table illustrated in FIG. 8 of Tahara as teaching the recited "graphic link information" and the data files INFOFILE.001, INFOFILE.002, and INFOFILE.003 as teaching the recited "graphic image". However, as graphic link information, the Examiner identifies a **single** table (PCLINK.TBI) linking **multiple** data files INFOFILE.001, INFOFILE.002, and INFOFILE.003 to video file VIDEO.001. Accordingly, under the Examiner's first interpretation of the teachings of Tahara, Tahara fails to teach "the graphic link

information including a **plurality** of pieces of graphic link information” (emphasis added), or “each of the plurality of pieces of graphic information having a **one-to-one** relationship with the corresponding graphic image” (emphasis added) as claim 25 recites.

With respect to the second argument, in the Response to Arguments section of the current Office Action, the Examiner appears to identify the data files INFOFILE.001, INFOFILE.002, and INFOFILE.003 taught by Tahara as the recited “graphic link information”, and the keywords “HOW TO GREET”, “HOW TO ANSWER” and “HOW TO SELF INTRODUCE” as the recited “graphic image”. However, Applicants respectfully disagree with this interpretation. Specifically, the data files INFOFILE.001, INFOFILE.002, and INFOFILE.003 **cannot be read upon by the “graphic link information” recited in claim 25** because Tahara does not actually teach the data files INFOFILE.001, INFOFILE.002, and INFOFILE.003 **linking** anything to VIDEO.001 as the Examiner asserts. FIG. 8 of Tahara illustrates, for example, that the data file INFOFILE.001 is on the same line of the PCLINK.TBI table as the video data VIDEO.001 and the keyword “HOW TO GREET, but the actual **link** between the INFOFILE.001, VIDEO.001 and keyword “HOW TO GREET” is provided by the PCLINK.TBI table, as illustrated in FIG. 8 of Tahara, **not the INFOFILE.001 itself**. This relationship is illustrated in FIGS. 2 and 8 of Tahara and explicitly stated in column 5, lines 34-48 of Tahara which read:

The file names and directory names depicted in the figure are not the same as those defined by the Video-CD standard, nor do they show all of the files defined by the same standard. More particularly, the PC data recording area 105 is newly added in the present invention and is herein depicted as having a directory <PC>. In the PC data recording area 105, there are recorded text files (INFOFILE.001, INFOFILE.002 in FIG. 2) which are related to the image data recorded in the Video-CD recording area 104, **and a link table (PCLINK.TBL) for providing correlation**. The PC application recording area 106 is newly added in the invention and is herein depicted as having a directory <PCAP>. In the area 106, there is

recorded a program file (VIDEOCD.EXE) for performing reproduction of image data and text data by means of a PC.

Accordingly, even under the Examiner's second interpretation of the teachings of Tahara, Tahara still fails to teach either "each of the plurality of pieces of graphic link information **linking** a corresponding graphic image stored in a second file separate from the first file with a plurality of main video image (emphasis added)" or "each of the plurality of pieces of graphic information having a **one-to-one** relationship with the corresponding graphic image (emphasis added)", both of which are recited by claim 25.

Kim likewise fails to teach these limitations. With respect to Kim, the Examiner asserts Kim teaches linking a graphic image with a plurality of video images and references FIG. 14, the abstract and column 1, lines 55-67, and column 7, lines 47-61 of Kim. The aforementioned portions of Kim discuss a caption-based search function that includes a caption-based search window which may be used to search moving picture data based on caption data linked to that moving picture data (Kim: col. 7, lines 47-61). However, the Examiner does not identify where Kim teaches **graphic link information** as claim 25 recites. Accordingly, Kim is silent as to the nature of the graphic link information, if any, used to implement the caption-based search function taught by Kim. Thus, Kim cannot teach "the graphic link information including a plurality of pieces of graphic link information", or "each of the plurality of pieces of graphic information having a one-to-one relationship with the corresponding graphic image" as claim 25 recites. Accordingly, neither Kim, nor Tahara, alone or in combination, teaches each of the limitations of claim 25. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to claim 25, as is required to support a rejection under §103.

Claims 1-3, 6, 8-16, and 18-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tahara in view of Kim and further in view of Burgess et al. (US 7, 110, 137, hereinafter "Burgess").

Claim 1 recites "recording a plurality of pieces of graphic link information on the recording medium to link the plurality of graphic images with the main video image for overlaying the main video image with the plurality of graphic images" and "each of the plurality of pieces of graphic link information associates a single graphic image from among the plurality of graphic images with a plurality of different main video images, and the plurality of pieces of graphic link information having a one-to-one relationship with the plurality of graphic images". For the same reasons discussed with respect to claim 25 above, neither Tahara, nor Kim, alone or in combination, teach these limitations. Further, even a cursory review of Burgess reveals that Burgess likewise fails to teach the aforementioned limitations of claim 1. Accordingly, none of Tahara, Kim, and Burgess, alone or in combination, teach each of the limitations of claim 1. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to claim 1, or any claims depending from claim 1, as is required to support a rejection under §103.

Additionally, claims 6, 16 and 21 have been amended and include limitations at least somewhat similar to those of claim 1. Accordingly, at least by virtue of the similarity between claim 1, and claims 6, 16 and 21, the Examiner cannot establish a *prima facie* case of obviousness with respect to any of claims 6, 16 and 21, or any claims depending from claims 6, 16, or 21, as is required to support a rejection under §103.

Therefore, Applicants respectfully request the rejection of claims 1-3, 6, 8-16, and 18-24 under 35 U.S.C. § 103 be withdrawn.

Claims 7 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tahara in view of Kim and further in view of Burgess as applied to claims 1-3, 6, 8-16, and 18-24, and further in view of Russ (US 5,446,857, hereinafter "Russ").

The deficiencies of Tahara, Kim and Burgess are discussed above and are relevant here because claim 7 depends from claim 6, and claim 17 depends from claim 16. Russ fails to remedy these deficiencies. Accordingly, none of Tahara, Kim, Burgess, and Russ, alone or in combination, teach each of the limitations in either of claims 7 and 17. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to either of claims 7 and 17, or any claims depending from claims 7 and 17, as is required to support a rejection under §103.

Therefore, Applicants respectfully request the rejection of claims 7 and 17 under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

Accordingly, in view of the above amendments and remarks, reconsideration of the objections and rejections and allowance of each of claims 1-3 and 6-26 in connection with the present application is earnestly solicited.

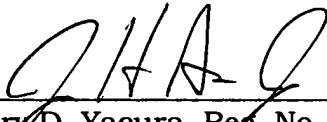
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Gary D. Yacura at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No.

08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. §1.17; particularly, extension of time fees.

Respectfully submitted,

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